



Metro | *Making a great place*

October 23, 2015

Mr. Steve Kountz
Portland Bureau of Planning & Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Additional Comments on Employment Zoning Project

Dear Mr. Kountz:

Metro appreciates the opportunity to provide additional input on the City of Portland's Employment Zoning Project as it continues to evolve. Metro previously submitted comments on the Discussion Draft in a letter from Chief Operating Officer Martha Bennett dated September 4, 2015. We have now had the opportunity to review the city's revisions included in the Proposed Draft, and we were pleased to see that many of our comments are reflected in the latest draft, including several revisions to the zoning map that we requested.

Our remaining concerns fall into two categories: (1) some specific mapping issues related to the location of the Prime Industrial (PI) overlay zone, and (2) the broader concern raised in our previous comments regarding impacts on future Metro open space acquisitions if undeveloped natural areas become a prohibited use within the PI overlay.

First, closer review of GIS maps showing the specific location of the PI overlay indicates that the city's PI mapping still includes approximately 111 acres of Metro-managed open spaces, primarily in the vicinity of and adjacent to the Smith & Bybee Wetlands Natural Area. The attached maps depict the mapping discrepancies. We request that these pieces of land be removed from the PI overlay zone.

Second, we remain concerned regarding one of our proposed amendments that was not addressed in the city's latest proposed draft. Specifically, Section 33.475.080 continues to prohibit "open areas" within the PI overlay, which may adversely affect important target areas for protecting wildlife and habitat.

The Natural Areas Bond measure, passed by the voters of this region in 2006, directs Metro to buy land to protect clean water and wildlife habitat. The Columbia Slough is an important target area identified in the 2006 Bond for protecting wildlife and habitat, and is located within the PI overlay. Since the Bond's passage, Metro has made significant investments in this target area, consistent with the Refinement Plan the Metro Council passed in 2007. Additionally, Metro has awarded grants to the City of Portland to support

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their efforts to sustain and improve wildlife habitat along the slough. For example, Metro recently awarded a grant to the City for expansion of facilities at Whitaker Ponds Natural Area, which is located on the slough. The city's proposal to change open areas from an allowed use to a prohibited use in the PI overlay has potentially significant negative implications for Metro's acquisition program, which the voters expect to see realized.

As was submitted previously, Metro strongly recommends that undeveloped natural areas be an allowed use under 33.475.080, including both upland and riparian areas. Metro's position remains that undeveloped natural areas are intended for conservation, habitat protection, or stormwater functions in these zones and are not prohibited within an RSIA under Title 4 of Metro's Urban Growth Management Functional Plan.

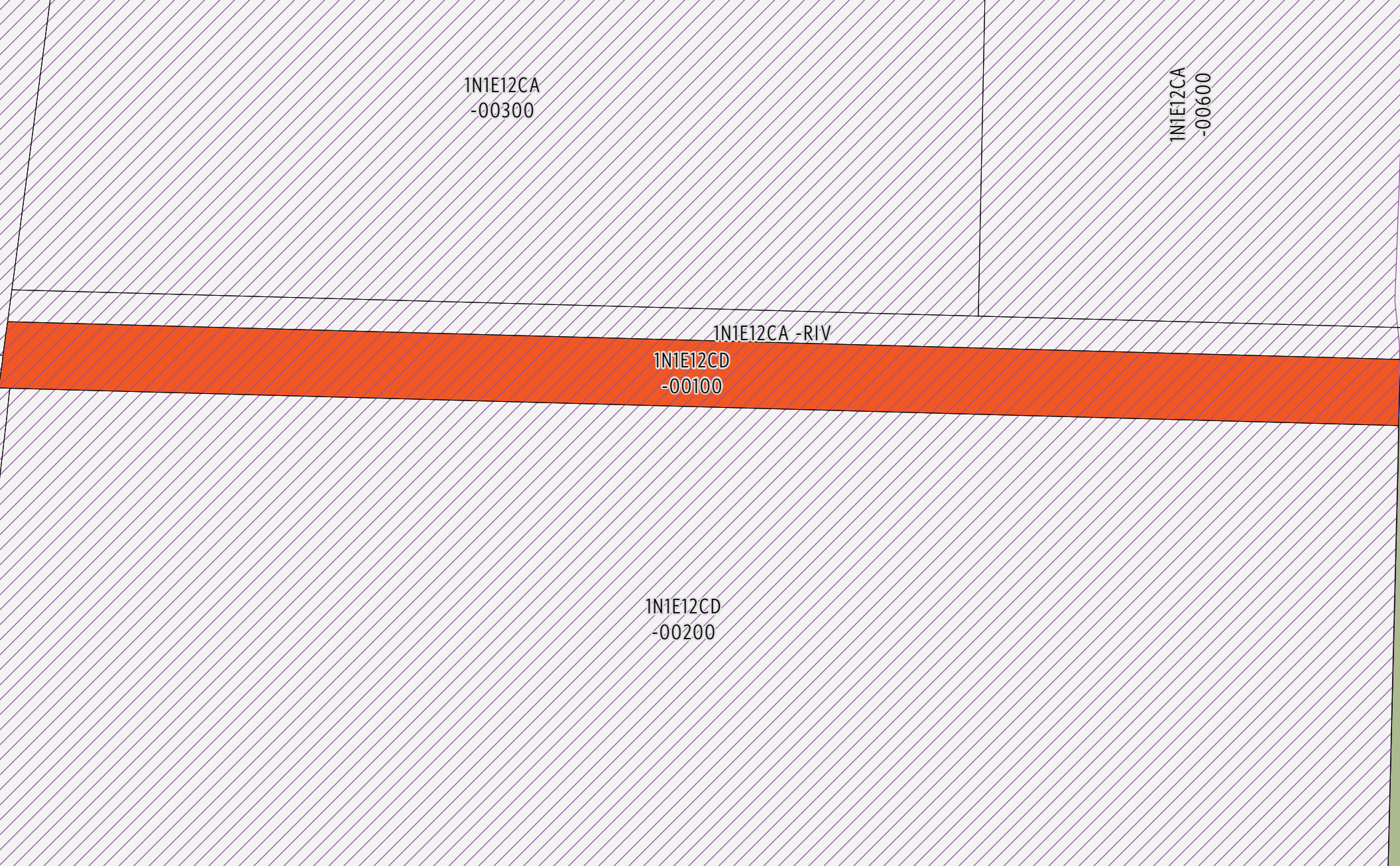
While we recognize the importance of protections for industrial lands, we remain committed to delivering the voter approved natural areas program as well. Because these natural areas would be undeveloped, we anticipate few conflicts with existing or future industrial uses or freight mobility. Thank you for the opportunity to provide Metro's comments in this proposal.

Sincerely,



Kathleen Brennan-Hunter
Director, Parks and Nature Department

cc: Martha Bennett, Metro Chief Operating Officer
Scott Robinson, Metro Deputy Chief Operating Officer
Lisa Goojian, Metro Parks and Nature Planning Manager
Ted Reid, Metro Principal Planner
Roger Alfred, Metro Senior Assistant Attorney
Robert Spurlock, Metro Associate Planner



1N1E12CA
-00300

1N1E12CA
-00600

1N1E12CA -RIV

1N1E12CD
-00100

1N1E12CD
-00200



Proposed Prime Industrial Overlay Zone



Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone



Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone



Metro Owned and/or Managed Sites








Taxlot Parcels

1 - Broadmoor

0.45 acres








-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed Sites
-  Taxlot Parcels

2 - Smith and Bybee Wetlands
2.48 acres

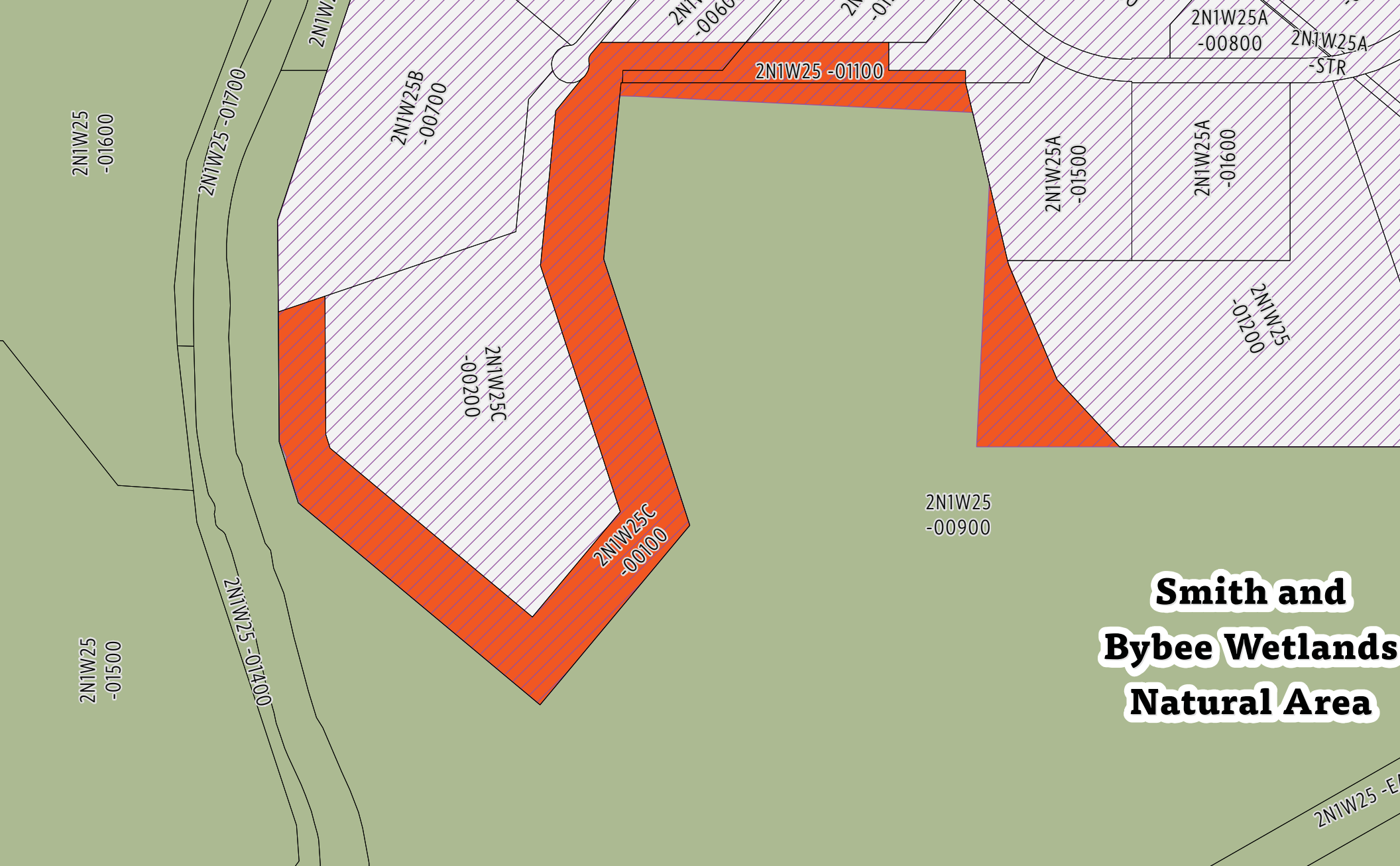


**Smith and
Bybee Wetlands
Natural Area**






2N1W25
-01600

-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed Sites
-  Taxlot Parcels

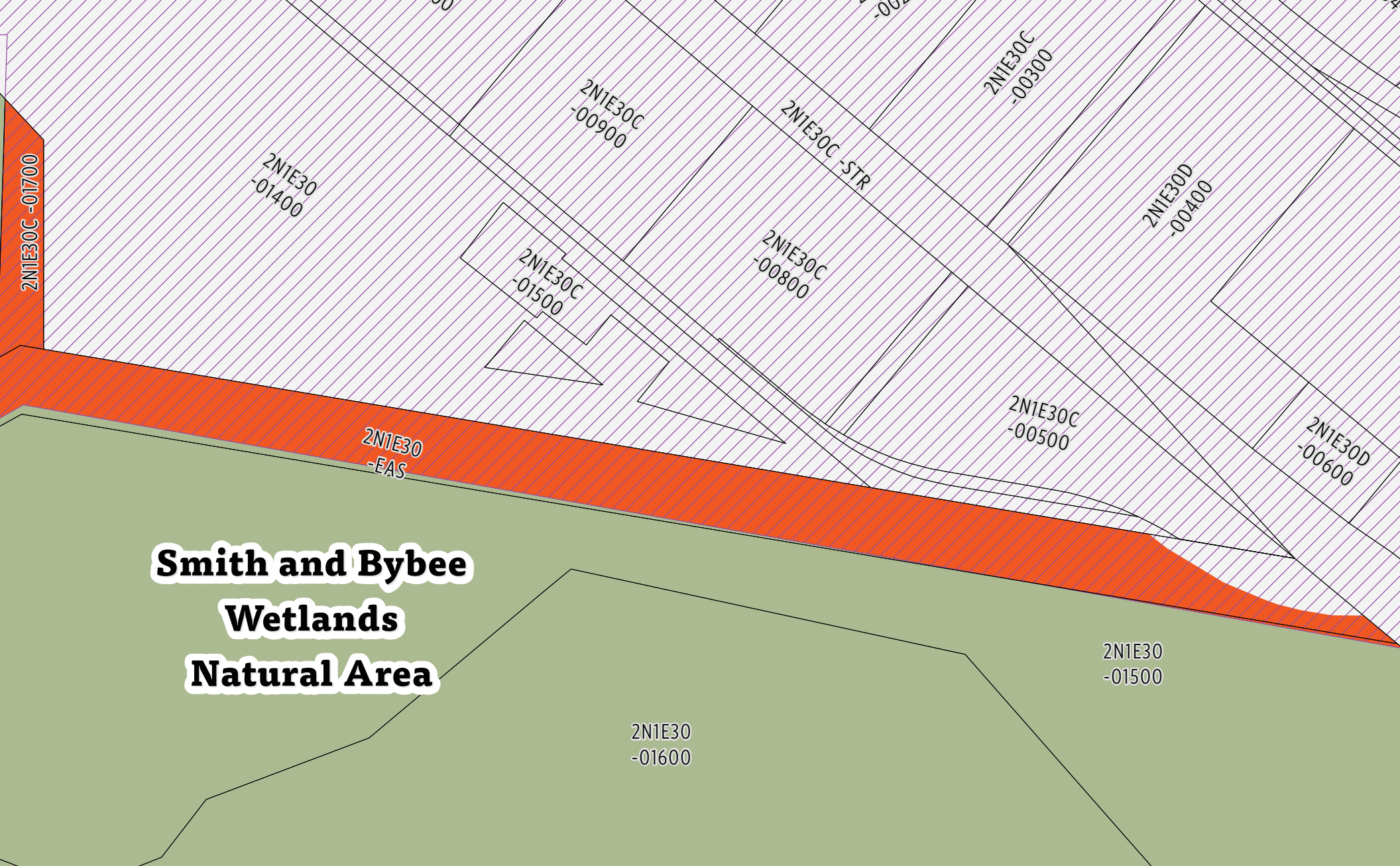
3 - Smith and Bybee We
0.34 acres



**Smith and
Bybee Wetlands
Natural Area**






-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed Sites
-  Taxlot Parcels

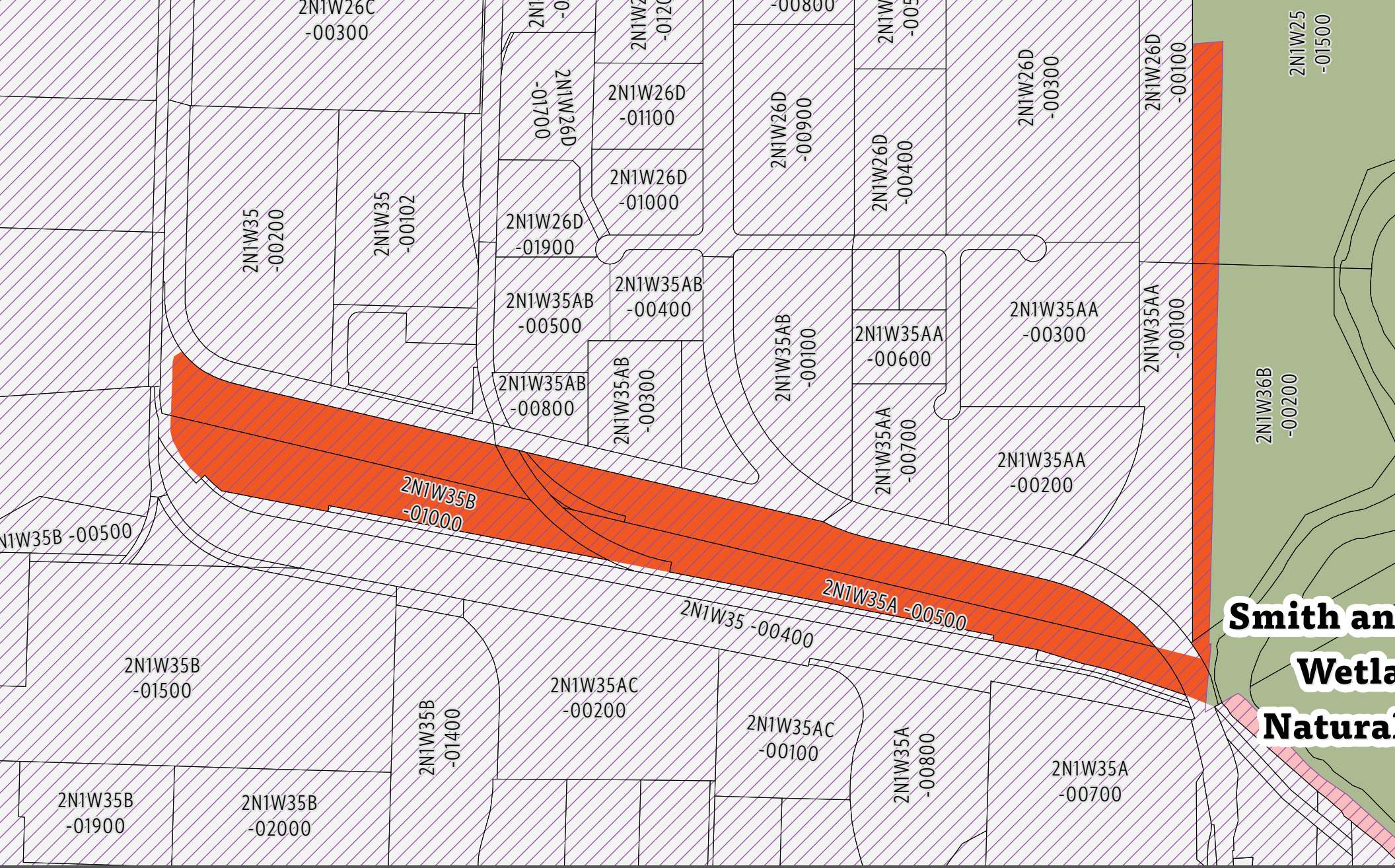
4 - Smith and Bybee Wetlands
23.58 acres








**Smith and Bybee
Wetlands
Natural Area**

5 - Smith and Bybee We
10.41 acres

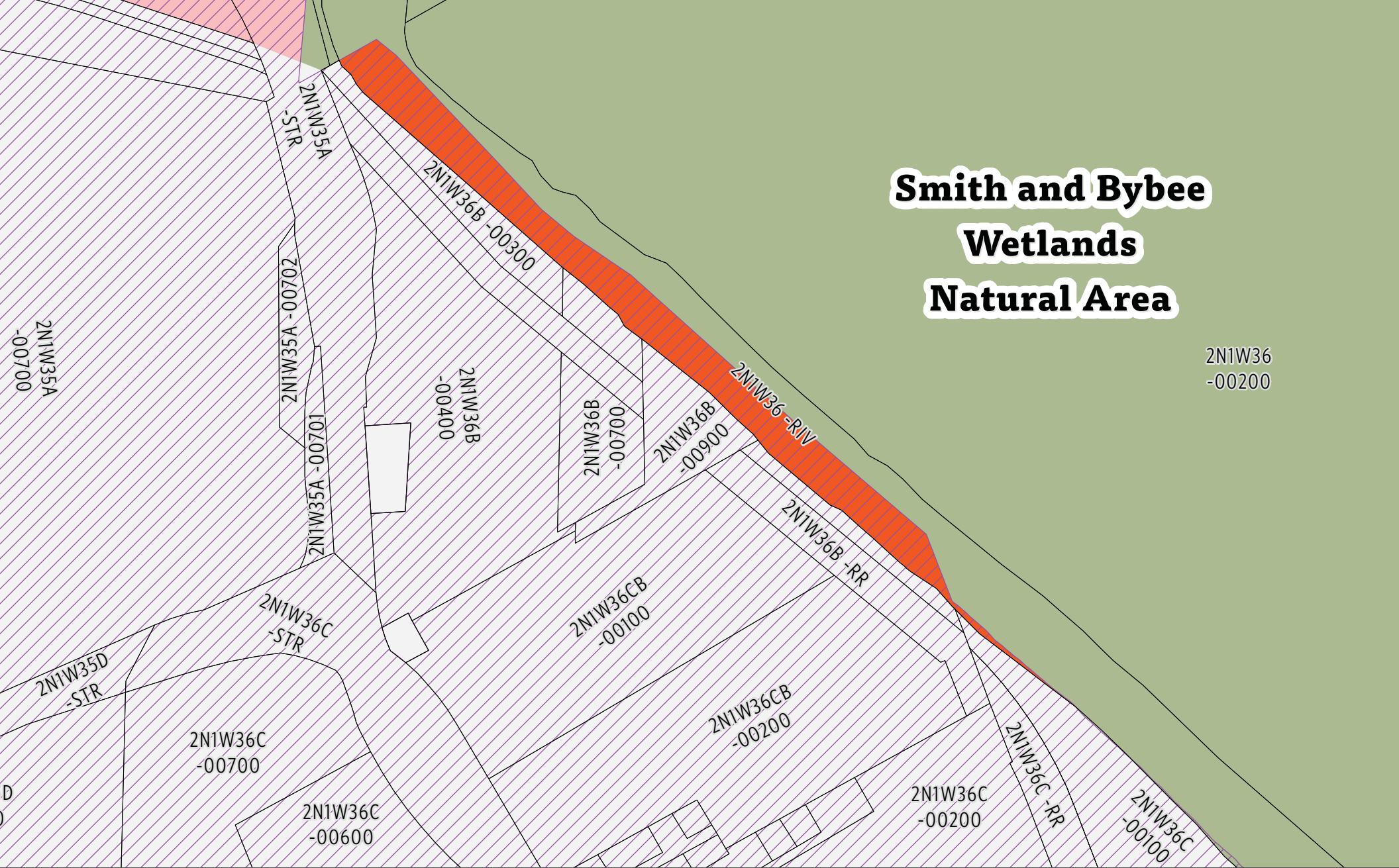
-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed Sites
-  Taxlot Parcels








-  Proposed Prime Industrial Overlay Zone
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6 - Smith and Bybee Wetlands Natural Area
 39.75 acres

Smith and Bybee Wetlands Natural Area



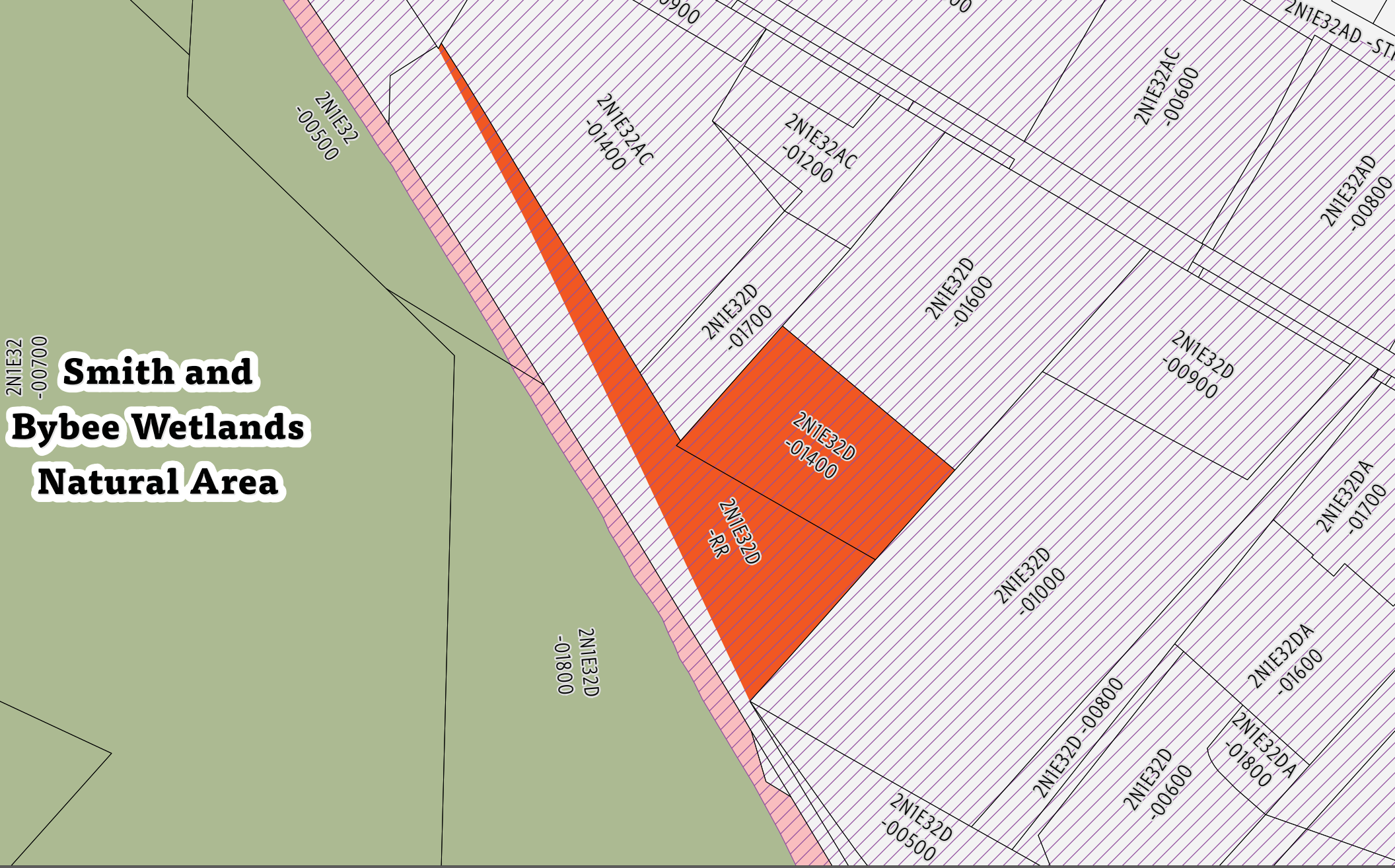
2N1W36
-00200






-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
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7 - Smith and Bybee We
2.19 acres

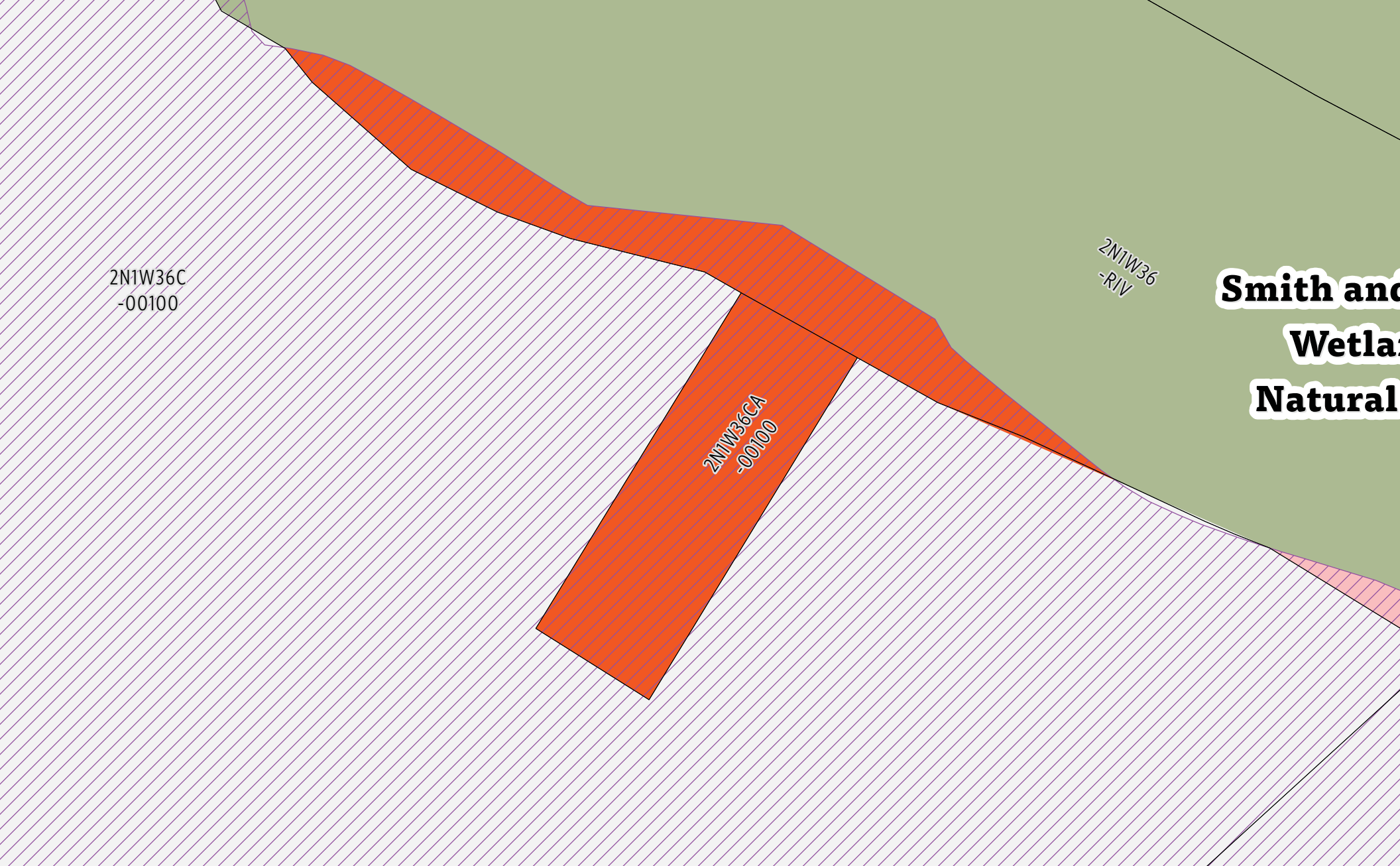
2N1E32
-00700






Smith and Bybee Wetlands Natural Area



-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed Sites
-  Taxlot Parcels

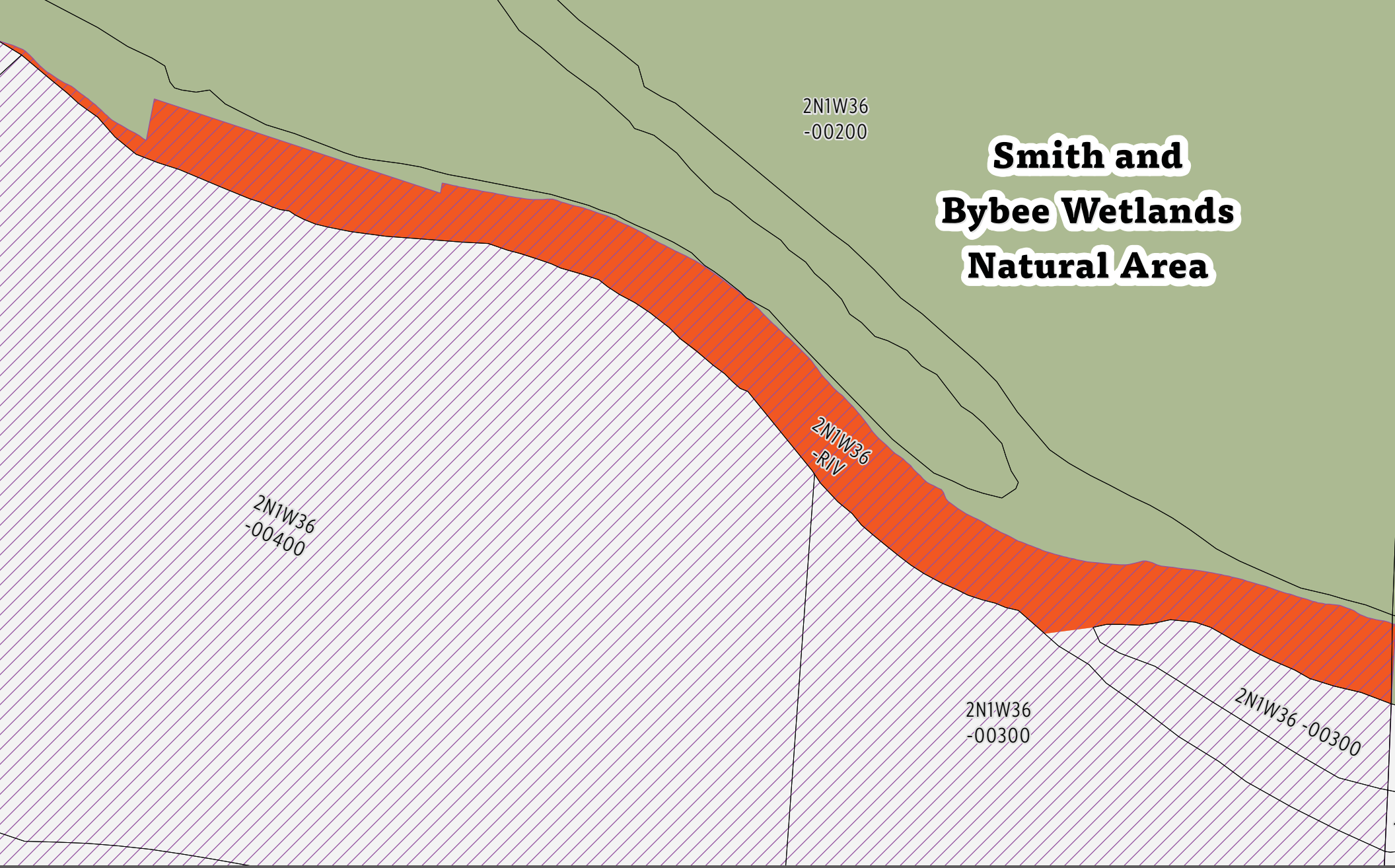
9 - Smith and Bybee W
6.22 acres








-  Proposed Prime Industrial Overlay Zone
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10 - Smith and Bybee W
 0.16 acres

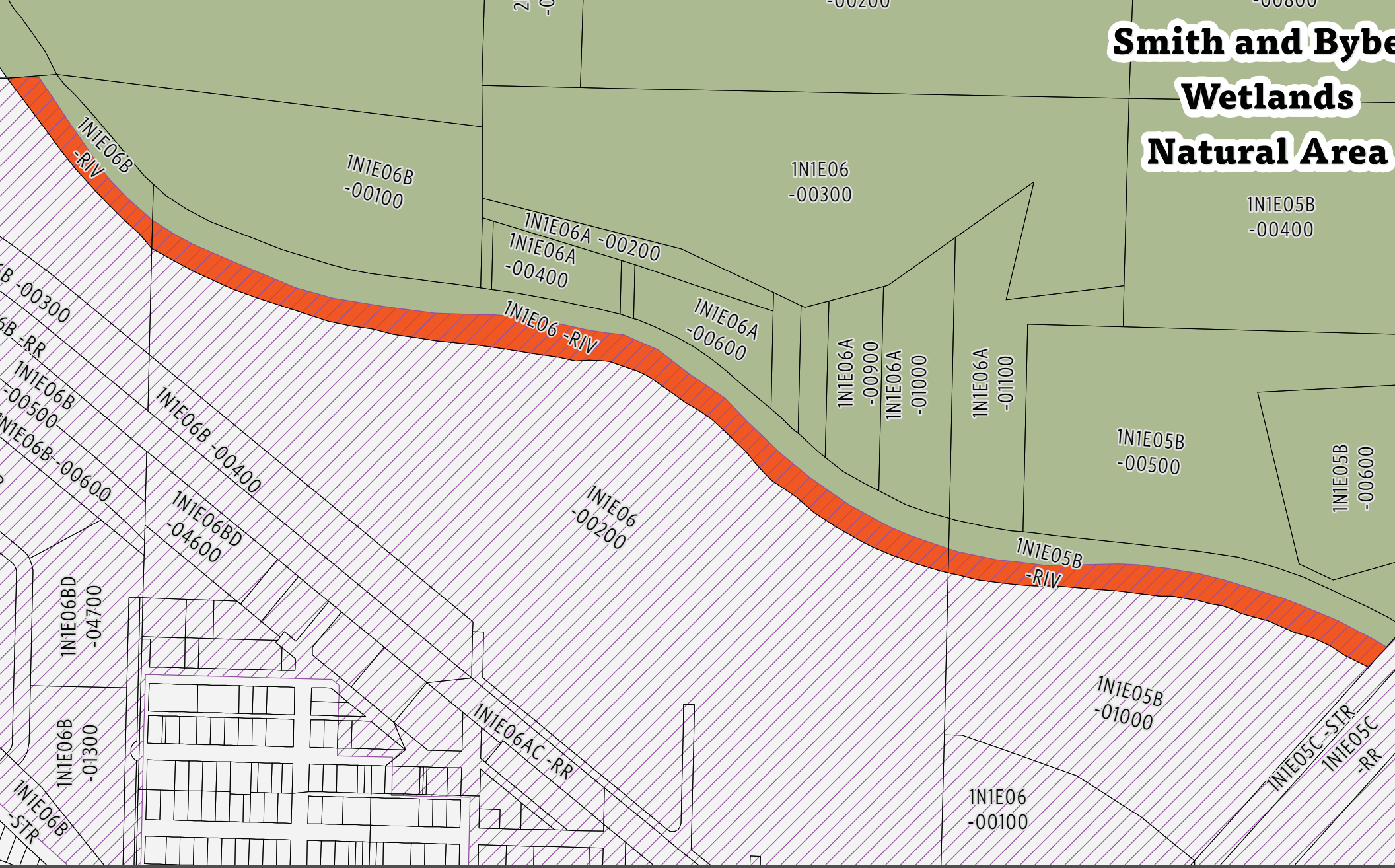
Smith and Bybee Wetlands Natural Area








11 - Smith and Bybee W
7.8 acres

-  Proposed Prime Industrial Overlay Zone
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-  Taxlot Parcels

Smith and Bybee Wetlands Natural Area



-  Proposed Prime Industrial Overlay Zone
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12 - Smith and Bybee W
11.64 acres